

MORRISON TENENBAUM PLLC

*Proposed Counsel to the Debtor*

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Lawrence F. Morrison, Esq.

Brian J. Hufnagel, Esq.

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

HUNAN MANOR LLC,

Case No. 18-42753 (CEC)

Debtor.

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**AFFIRMATION OF LAWRENCE F. MORRISON  
IN SUPPORT OF APPLICATION FOR AUTHORITY  
TO RETAIN MORRISON TENENBAUM PLLC AS COUNSEL TO DEBTOR AND  
DEBTOR IN POSSESSION EFFECTIVE AS OF MAY 11, 2018**

LAWRENCE F. MORRISON, Esq. affirms as follows:

1. I am an attorney duly admitted to practice before this court. I am a partner at the firm of Morrison Tenenbaum PLLC (the “MT Law”), with offices located at 87 Walker Street, Floor 2, New York, New York 10013. I am familiar with the matters set forth herein, and make this affirmation in support of the application (the “Application”) of Hunan Manor LLC (the “Debtor”) for authority to retain MT Law as counsel to the Debtor under a general retainer, effective as of May 11, 2018.

2. Subject to control and further order of this Court, the professional services that MT Law will render to the Debtor shall include the following:

- a. advising the Debtor with respect to its powers and duties as debtor-in-possession in the management of its estate;

- b. assisting in any amendments of Schedules and other financial disclosures and in the preparation/review/amendment of a disclosure statement and plan of reorganization;
- c. negotiating with the Debtor's creditors and taking the necessary legal steps to confirm and consummate a plan of reorganization;
- d. preparing on behalf of the Debtor all necessary motions, applications, answers, proposed orders, reports and other papers to be filed by the Debtor in this case;
- e. appearing before the Bankruptcy Court to represent and protect the interests of the Debtor and its estate; and
- f. performing all other legal services for the Debtor that may be necessary and proper for an effective reorganization.

3. I have reviewed MT Law's current and past clients and have compared them to the schedules and lists provided by the Debtor of: (i) its twenty (20) largest creditors as set forth in its petition; (ii) its secured creditors as set forth in the petition; (iii) the Debtor's equity holders; and (iv) all shareholders, directors and officers of the Debtor. To the best of my knowledge, and based upon MT Law's due inquiry, MT Law does not and has not, represented any of the parties related to the Debtor, its creditors or other parties-in-interest. MT Law has not, does not and will not represent such entities, or any of its respective affiliates or subsidiaries, in matters related to this case.

4. Brian J. Hufnagel, of counsel to MT Law was employed as a trial attorney with the Office of the United States Trustee during the period of 2005-2008. Mr. Hufnagel had no dealings with this Debtor while employed with the United States Trustee.

5. Although MT Law has attempted to identify all such representations, it is possible that MT Law may have represented certain of the Debtor's creditors or other entities that consider themselves parties-in-interest in matters unrelated to this case. If MT Law discovers additional

information that requires disclosure for the Application, MT Law will promptly file supplemental disclosures with the Court.

6. To the best of my knowledge and information formed after a reasonable inquiry, neither MT Law nor any member or attorney thereof holds nor represents any interest adverse to the Debtor or its estate. More specifically, MT Law, its counsel and associates:

- a. are not creditors, equity holders or insiders of the Debtor;
- b. are not and were not, within two (2) years before the date of the filing of the Debtor's chapter 11 petition, directors, officers or employees of the Debtor; and
- c. do not have an interest adverse to the interest of the Debtor's estate or of any class of creditors or equity holders by reason of any direct or indirect relationship to, connection with, or interest in the Debtor, or for any other reason.

7. Based upon all of the foregoing, I believe that MT Law is a "disinterested person" within the meaning of §101(14) of Title 11, United States Code (the "Bankruptcy Code").

8. No agreement exists to share any compensation received by MT Law for its services to the Debtor with any other person or firm. No promises have been received by MT Law or by any member or attorney thereof as to compensation in connection with this case other than to conform with 11 U.S.C. § 504.

9. MT Law is willing to be retained by the Debtor as its counsel and will bill at the following hourly rates, which are \$525.00 per hour for Lawrence F. Morrison, \$380.00 per hour for associates and of counsel attorneys (including Brian J. Hufnagel) and \$175.00 per hour for paraprofessionals. MT Law will notify the Office of the United States Trustee, and the Court, regarding any adjustments. MT Law will also seek reimbursement for all out-of-pocket disbursements in connection with the Debtor's case. On May 11, 2018, MT Law received \$1,717.00 for the chapter 11 filing fee from the Debtor.

10. MT Law has agreed to make appropriate applications to this Court for compensation and reimbursement of expenses as required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules of the United States Bankruptcy Court for the Eastern District of New York and the Guidelines for Fees and Disbursements for Professionals propounded by the Office of the United States Trustee.

Dated: New York, New York

June 18, 2018

MORRISON TENENBAUM PLLC



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By: Lawrence F. Morrison, Esq.  
*Proposed Counsel for the Debtor and  
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